

the rest of the non-coin calls broke down as follows: 24 (12 percent) were 0+ calls, 10 (5 percent) were 0- calls, 5 (2 percent) could be positively identified as prepaid card-calls, 2 (1 percent) were 00- calls, 12 (6 percent) were 411 calls, and 2 (1 percent) were 555 calls. The remainder of the non-coin calls, which totaled 108 (53 percent), appear to be subscriber 800 calls.

Of the 39 access code calls per month, AT&T received 20.1 calls (51.5 percent), MCI received 12.6 calls (32.2 percent), Sprint received 3 calls (7.7 percent), and the remaining carriers received a total of 3.3 calls (8.6 percent).

This of course brings us to dialaround compensation. The 1996 data showed an average of 152 dial-around calls per payphone per month: 108 (71 percent) were subscriber 800 calls, 39 (26 percent) were access code calls, and 5 (3 percent) were prepaid card calls. (To prevent any confusion, we

Dial-around Stats - Monthly Average per IPP*

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Access Code Calls	31	40	38	44	39	46	49	35	39	38	32
Prepaid Card Calls	3	3	3	3	4	7	7	6	6	5	4
Subscriber 800 Calls	75	98	96	102	107	111	122	103	130	126	119
411	10	11	11	13	15	14	12	14	12	10	11
555	1	2	2	1	2	2	2	2	3	2	2
·, 0 -	11	10	10	11	12	13	11	9	8	7	7
00-	1	1	1	1	2	2	2	2	3	2	2
0+:	29	31	26	27	25	25	·. 28	20	19	18	16
Non-coin Calls Total	161	196	188	203	205	219	233	191	219	210	195
Coin Calls Total	423	505	468	535	536	556	544	526	524	494	509
Coin & Non-coin Total	584	701	656	738	742	775	777	716	744	704	703
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Prepaid Card Calls	2%	2%	2%	2%	2%	3%	3%	3%	3%	3%	2%
endighter the fire		2									
411	6%	6%	6%	6%	7%	6%	5%	7%	6%	5%	6%
72°C											
0-	7%	5%	6%	6%	6%	6%	5%	5%	4%	4%	4%
a.e.			;								
0+	18%	16%	14%	13%	12%	11%	12%	11%	9%	9%	8%

^{*} Due to rounding, the totals in this table may not be exact.

72%

72%

71%

73%

72%

72%

70%

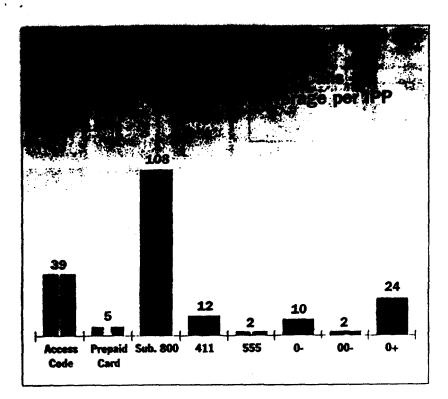
73%

71%

70%

72%

Coin Calls Total



should note that the APCC had previously submitted dial-around data to the FCC that showed a total of 142 dial-around calls per month: 99 [70 percent] were subscriber 800 calls, 40 [28 percent] were access code calls, and 3 [2 percent] were prepaid card calls. These stats were based on three months' worth of data; the current results are from 11 months' worth of data.)

A few trends

The 1996 data also revealed what many of you already knew: coin-sent paid is the predominant type of call made from payphones, representing 72 percent of all calls. Concerning non-coin calls, subscriber 800 is the most prevalent call type. In fact, this category increased from 47 percent of all non-coin calls in February to 61 percent of all non-coin calls in December. Access code calls declined slightly throughout the year: 20 percent in February, a high of 21 percent in May, July and August, and a low of 17 percent in December.

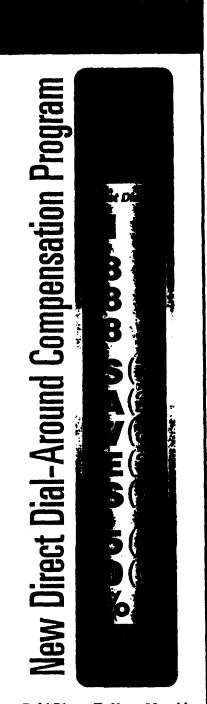
Regarding other types of non-coin calls, directory assistance calls remained consistent during 1996.
As for operator-assisted calls, 0- calls

declined slightly during the year: from 7 percent in February to 4 percent in December. The 00- calls remained relatively flat (at 1 percent), while 0+ calls decreased dramatically, from 18 percent in February to 8 percent in December.

Which IXCs are getting these non-coin calls? The top seven carriers receive 97.4 percent of all access code calls. This group consists of AT&T, MCI, Sprint, LDDS WorldCom, Frontier, LCI and Excel. Figure 1 shows the percentage breakdown by IXC.

Clearly, this new data justifies the level of dial-around compensation that was set in the FCC's Payphone Order. It also substantiates the move to percall compensation, and verifies a few other trends we had suspected but had not been able to quantify. The APCC will continue to gather this information for use in its legal, legislative and regulatory efforts. If you'd like to participate or if you'd like more information about the project, please call me at (703) 385-5300, ext. 225.

Gregory V. Haledjian is government relations manager for the American Public Communications Council.



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I hereby certify that on October 30, 1997, I caused a copy of the foregoing Comments of the American Public Communications Council on Requests for Waivers of the ANI Digits Requirement to be sent by first class mail, postage prepaid or by hand delivery, to:

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